

## **EQUAL EMPLOYMENT OPPORTUNITY AND AFFIRMATIVE ACTION POLICY**

It is and has been the policy of Lewis and Roca to recruit, hire, develop and promote employees based on the individual's ability and job performance. We will not discriminate on the basis of: race, sex, sexual orientation, gender, religion, national origin, color, age, physical or mental disability, spousal affiliation, marital status, a serious medical condition, genetic information, veteran status, or any other basis prohibited by federal, state or local law. Our policy applies to all conditions and all areas of the workplace, including hiring decisions, promotions, training, pay, benefits, layoffs, and terminations. In addition, it continues to be our policy to maintain a working environment that is free of harassment.

The firm prohibits any form of retaliation against any employee for making a good faith complaint under this policy or for assisting in a complaint investigation. However, if after investigating any complaint of harassment or unlawful discrimination, the firm reasonably determines the complaint was brought in bad faith or that an employee has provided false information regarding the complaint, disciplinary action may be taken against the individual who filed the complaint or who gave the false information.

The firm's Affirmative Action Program gives structure to our commitment to hire and promote qualified minorities, women, individuals with a disability, disabled veterans, veterans of the Vietnam-Era, and other covered veterans according to their abilities. Every Lewis and Roca employee has a responsibility to support this policy and to ensure that it is fully implemented within our organization. To this end, employees are encouraged to bring Equal Employment Opportunity ("EEO") problems to our attention so that the issues can be investigated and the appropriate action taken. There will be no coercion, intimidation or harassment of any employee who calls attention to such problems, who files a complaint, or who participates in an investigation, compliance review or hearing related to these issues.

Responsibility for our Affirmative Action Program is delegated to the Director of Human Resources (currently Christine Stangl) who will serve as EEO Officer and report to the Chief Operating Officer (currently Robert McCormick) on the firm's progress as well as any problems encountered in the implementation of this program. In addition, Lewis and Roca's lawyers, managers, and supervisors, particularly those who have the authority to hire and

promote, have specific responsibilities for the implementation and continued success of the Affirmative Action Program. The COO will review the firm's affirmative action efforts and results regularly.

Employees who have questions should contact Christine Stangl. The Affirmative Action Program is available for review by employees during normal business hours. The Affirmative Action Program will be reviewed and updated each year.